

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ZIP CO US, INC.

Plaintiff,

v.

PETER MAHER, OVANTI LTD, and
OVANTI US, INC.,

Defendants.

Civil Action No. _____

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Plaintiff, Zip Co US, Inc. (“Zip”), by and through its undersigned counsel, pursuant to Federal Rule of Civil Procedure 65, moves for the grant of a temporary restraining order and a preliminary injunction in favor of Zip and against Defendants Peter Maher (“Maher”), Ovanti Limited, and Ovanti US, Inc. (Ovanti Limited and Ovanti US, Inc., collectively “Ovanti”). The basis for injunctive relief is set forth fully in the accompanying Memorandum of Law, which Zip incorporates here by reference. **In sum, Maher and Ovanti have misappropriated Zip’s Confidential Information and property, Maher has taken Zip’s Confidential Information and property to Zip’s direct competitor, and Maher and Ovanti are actively misusing Zip’s Confidential Information and property to unlawfully compete with Zip and solicit Zip’s clients, suppliers, and staff, in flagrant breach of Maher’s contractual and fiduciary obligations to Zip. If an immediate TRO is not entered, Zip will suffer irreparable harm.**

WHEREFORE, Zip respectfully requests that this Court grant a temporary restraining order and a preliminary injunction in favor of Zip and against Maher and Ovanti, in the form of the accompanying Proposed Order.

Respectfully submitted,

/s/George C. Morrison

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Attorneys for Plaintiff

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